## BEFORE THE JUDICIAL PANEL ON MULTI-DISTRICT LITIGATION

In re: AMERIQUEST MORTGAGE CO.	)	
MORTGAGE LENDING PRACTICES	)	
LITIGATION	)	MDL Docket No. 1715
	)	

## **NOTICE OF POTENTIAL TAG-ALONG ACTIONS**

PLEASE TAKE NOTICE that, pursuant to J.P.M.L. Rules 7.2(i) and 7.5(e), the undersigned counsel for the plaintiffs gives notice of the following potential tag-along actions:

1. Michael Manning v. Ameriquest Mortgage Company,
Inc. and Citimortgage, Inc., d/b/a Citifinancial Mortgage

Company, Inc. Case No. 1:07-cv-00702-M (Southern District of Alabama, Southern Division) Magistrate Judge Bert W. Milling, Jr., presiding. A true and correct copy of the complaint in the Tag-along Action is attached as Exhibit A.

- 2. Stanley and Gladys Daniels v. Ameriquest Mortgage
  Company, Inc. and Citimortgage, Inc., d/b/a Citifinancial
  Mortgage Company, Inc. Case No. 1:07-cv-00703-CG-C
  (Southern District of Alabama, Southern Division) Chief
  Judge Callie V. S. Granade, presiding. A true and correct
  copy of the complaint in the Tag-along Action is attached
  as Exhibit B.
- 3. Sharon W. Crawford v. Argent Mortgage Company, Inc.

  Case No. 1:07-cv-00703-CG-M (Southern District of Alabama, Southern Division) Chief Judge Callie V. S.

  Granade, presiding. A true and correct copy of the complaint in the Tag-along Action is attached as Exhibit C.
- 4. Allie Bell Snowden v. Ameriquest Mortgage Company,

  Inc. Case No. 1:07-cv-00709-KD-M (Southern District of

Alabama, Southern Division) Judge Kristi K. DuBose, presiding. A true and correct copy of the complaint in the Tag-along Action is attached as Exhibit D.

Plaintiffs in this Tag-along Action are plaintiffs in the putative national class actions transferred by the Panel to the Northern District of Illinois for consolidated and coordinated pretrial proceedings (the "Borrowers' Consolidated Class). These Tag-along Actions allege the same general conduct, claim the same injury and see the same relief as the Borrowers' Consolidated Class Action. Likewise, these Tag-along Actions rely upon the same legal theories, require the same or similar factual determinations, and are governed by the same law.

Therefore, the Plaintiffs respectfully request that the Panel transfer this Tag-along Action to the Northern District of Illinois pursuant to J.P.M.L. Rule 7.4.

Respectfully Submitted this 18<sup>th</sup> day of October, 2007.

EARLY UNDERWOOD, JR.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this the 18<sup>th</sup> day of October, 2007, a copy of the foregoing was served on counsel for all parties to this proceeding by placing a copy of same in the U.S. Mail, properly addressed and first-class postage prepaid to:

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